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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIO CESAR GARCIA-CUEVAS,

Defendant.

Case No.: 2:19-cr-00019-MMD-NJK

**Joint Stipulation to Continue
Government's Response to Defendant's
Motion to Dismiss (ECF No. 26), and
Defendant's Reply**

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and Andrew Wong, Assistant Federal Public Defender, counsel for Julio Cesar Garcia-Cuevas, that the government's response to defendant's motion to dismiss (ECF No. 26) currently due on Friday, July 5, 2019, be vacated and continued to July 23, 2019, with defendant's corresponding reply due on July 30, 2019.

This Stipulation is entered into for the following reasons:

1. Government counsel continues to need additional time to properly respond to defendant's motion, to include researching the issues raised by the defendant.

2. Government counsel has requested a copy of records from the defendant's Immigration Court proceeding, and understands that it may be received within approximately three weeks of today's date. These records may be dispositive of the current motion.

3. Denial of this request for continuance could result in a miscarriage of justice.

4. This is the first request for continuance of the government response to defendant's motion to dismiss.

DATED this 1st day of July, 2019.

RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

By /s/ Andrew Wong

By /s/ Jared L. Grimmer

ANDREW WONG
Assistant Federal Public Defender

JARED L. GRIMMER
Assistant United States Attorney

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Case No.:2: 19-cr-00019-MMD-NJK

V.

Defendant.

DATED this 8th day of July, 2019.


UNITED STATES MAGISTRATE JUDGE